

BEFORE THE  
POSTAL REGULATORY COMMISSION  
WASHINGTON, D.C. 20268-0001

VALASSIS NSA

Docket No. MC2012-14

Docket No. R2012-8

Formal Comments on behalf of Times Publishing Co

May 22, 2012

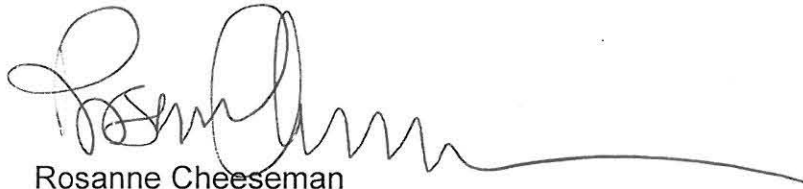
- I. This formal comment is filed on behalf of Times Publishing Co., the owner/operator of the Erie Times-News. The Erie Times-News is the newspaper of record for Erie County Pennsylvania.
- II. It has always been the mission of the Erie Times-News to represent and inform the people of northwestern Pennsylvania of important news and information in a broad and timely manner. We believe strongly that our news coverage and presentation of important issues plays a vital part in improving our community. We also know that the revenues generated by the advertisers of durable/semi-durable goods provides a significant portion of the resources needed to employ a local workforce of professional journalists that make us relevant and indispensable. Our coverage of key issues and vital statistics on how government works, election results, poverty rates, gun violence and education, along with key economic development projects like the Erie Inland Port are critical to job growth and improved quality of life.

- III. The USPS claim that the financial impact of the proposed NSA is only 0.6 percent of forecasted newspaper revenue is simply not true.
- a. The revenue at risk, should this NSA be approved, represents more than 10% of total advertising revenue and 65% of the funds needed to support our local journalism staff. Without it we could not serve our community in the same meaningful way.
  - b. The lack of proper due diligence in the USPS' data collection and the inaccuracy of the data which is provided will put good paying professional jobs at risk. Clearly, the need for better and more relevant and accurate data regarding the impact of the NSA to the newspaper industry needs to be collected. A broader group of sources, in addition to Valassis, the one single eligible company that stands to gain an unfair competitive advantage, needs to be considered.
  - c. The agreement as stated in the NSA allows Valassis the freedom to cancel after 90 days with 30 days notice and no penalty. This will create confusion in the marketplace and put the short-term health of both advertisers and suppliers at risk should Valassis leave some markets early due to a failure to launch in others.

IV. The competitive disadvantage the Erie Times-News will face should the NSA be approved puts at risk USPS revenues generated by our own Total Market Coverage products. A 20-40% rate break to Valassis will force us to consider private delivery of up 80,000 pieces of mail each week to remain competitive. At our current rates that represents \$642,000 annually to the USPS.

V. We ask that the Commission reject the proposed NSA.

Respectfully Submitted,



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President and Publisher



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VP of Sales and Marketing



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